

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

PEACOCK AUTOMOTIVE, LLC,)	
)	
Plaintiff)	
)	
v.)	CIVIL ACTION FILE
)	No. 4:18-cv-00060-WTM-GRS
FCA US LLC,)	
)	
Defendant)	
_____)	

JOINT MOTION TO STAY

The parties file this Joint Motion to Stay and state:

1. The parties have reached a conditional agreement to resolve the above-referenced litigation in its entirety that is subject to the satisfaction of certain external conditions and consummation of certain transactions by non-parties.
2. The parties reasonably anticipate that it may take up to seventy-five (75) days for the external conditions to be satisfied and non-party transactions to be consummated, at which time, the parties intend to file a stipulation of dismissal with prejudice of the pending litigation.
3. Pending before the Court are Defendant's Motion to Dismiss Amended Complaint (Doc. 23) and Motion to Stay Discovery and Disclosures (Doc. 33) as well as the parties' Joint Rule 26(f) Report (Doc. 31) setting out certain discovery objections and requests for extensions.
4. In light of the expected resolution of this litigation, and in the interests of efficiencies and judicial economy, the parties jointly request that the Court stay all proceedings, including, without limitation, any determination or consideration of Defendant's Motion to Dismiss Amended Complaint (Doc. 23) and Motion to Stay Discovery and Disclosures (Doc. 33)

and the entry of any pre-trial schedule, for a period of seventy-five (75) days to allow the parties to finalize the resolution of this litigation.

Wherefore, for the reasons stated above, the parties jointly move for entry of an Order staying this proceeding for a period of seventy-five (75) days.

Respectfully submitted this 21st day of August, 2018.

s/ R. Craig Spickard

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 21, 2018, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using CM/ECF. Copies of the foregoing document will be served upon interested counsel either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ R. Craig Spickard